REMARKS

These Remarks are submitted under 35 U.S.C. § 132, and 37 C.F.R. §§ 1.111 and 1.114 in response to the Office Action mailed on August 8, 2007 and is filed with an IDS and RCE.

Summary of the Examiner's Action and Applicants' Response

The Examiner rejected Claims 1-9 and 10-24 under 35 U.S.C. § 103(a) as being obvious based on U.S. Patent No. 5,740,425 to Povilus (hereinafter "Povilus"), in view of U.S. Patent Application Publication No. 2003/0130905 to Foster, et al. (hereinafter "Foster"), and further in view of U.S. Patent No. 7,107,226 to Cassidy, et al. (hereinafter "Cassidy"). Applicants respectfully traverse the rejections.

Claims 1-9 and 10-24 are pending.

Response to the Rejection of Claims 1-9 and 10-24 Under 35 U.S.C. § 103(a)

The Examiner rejected Claims 1-9 and 10-24 under 35 U.S.C. § 103(a) as being obvious based on Povilus, in view of Foster, and further in view of Cassidy.

Claims 1 and 18

Claims 1 and 18 have been rejected under 35 U.S.C. § 103(a) as being obvious based on Povilus, in view of Foster, and further in view of Cassidy.

For reasons set forth below, Applicants respectfully submit that the Examiner has not made a prima facie case of obviousness since he has not set forth any motivation for any theoretical combination of all three cited references. "The examiner bears the initial burden of factually supporting any prima facie conclusion of obviousness... The key to supporting any rejection under 35 U.S.C. 103 is the clear articulation of the reason(s) why the claimed invention would have been obvious". (MPEP § 2142). The analysis in support of an obviousness rejection under 35 U.S.C. 103 should be made explicit. (MPEP § 2142, citing *KSR International Co. v. Teleflex Inc.*, 127 S. Ct. 1727 (2007).

In the rejection of Claim 1 in the Office Action, the Examiner states variously that "[i]t would have been obvious to have **combined** the teachings of Povilus and Foster.." and "to have **combined** the teachings of Povilus and Cassidy ..." (See e.g., Office Action, page 3). (Emphasis added). Applicants respectfully submit, therefore, that the Examiner has supported the rejection based on a combination of references. Thus, it is respectfully submitted that the Examiner's

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rationale to support his conclusion of obviousness falls under MPEP § 2143 (G); i.e., "(G) Some teaching, suggestion, or motivation in the prior art that would have led one of ordinary skill to modify the prior art reference or to combine prior art reference teachings to arrive at the claimed invention."

"The rationale to support a conclusion that the claim would have been obvious is that 'a person of ordinary skill in the art would have been **motivated to combine the prior art to achieve the claimed invention** and that there would have been a reasonable expectation of success. *DyStar Textilfarben GmbH & Co. Deutschland KG v. C.H. Patrick Co.*, 464 F.3d 1356, 1360, 80 USPQ2d 1641, 1645 (Fed. Cir. 2006). If any of these findings cannot be made, then this rationale cannot be used to support a conclusion that the claim would have been obvious to one of ordinary skill in the art." (MPEP § 2143). (Emphasis added).

Applicants respectfully submit that the Examiner has not set forth any suggestion or motivation for combining the teachings of Povilus **and** Foster **and** Cassidy. It is respectfully submitted that, instead, the Examiner indicates a supposed motivation for combining Povilus and Foster, and a supposed motivation for combining Povilus and Cassidy; however, the Examiner failed to set forth a suggestion or motivation to combine **all three cited reference's teachings**. (See e.g., Office Action page 3). That is, the Examiner has **not** provided the requisite rationale to support a conclusion that a person of ordinary skill in the art would have been motivated to combine all three of the cited references, Povilus and Foster and Cassidy, to achieve the claimed invention. Thus, Applicants respectfully submit that the Examiner's rationale cannot support a finding of obviousness. Therefore, Applicants respectfully submit that the requisite **prima facie case of obviousness has not been made**.

Further, in the Examiner's "Response to Arguments" on page 7 of the Office Action, the Examiner stated that "proper motivation to combine was given in the preceding action". Applicants respectfully submit, however, that the preceding action did not address the pending Claim 1, but instead addressed the claims before the amendment mailed June 27, 2007. Further, it is respectfully submitted that the preceding action did not contain any motivation to combine all three of the cited references together to achieve the claimed invention. For this additional reason, Applicants respectfully submit that the Examiner's rationale in the Office Action does not and cannot support a finding of obviousness.

Applicants respectfully submit that even if there was such requisite rationale to combine the three cited references, which Applicants contend that there isn't, a theoretical combination of Povilus and Foster and Cassidy does not teach or suggest the data structure claimed in Claim 1. The data structure recited in Claim 1 is a data structure of a database for use in capturing product data by inputting and storing the product data in the database, and includes, among other things, at least one class definition, and a plurality of category definitions. Claim 1 also recites "a plurality of attribute group definitions element, each attribute group definition being arranged to identify one or more attributes that are associated with the attribute group of a product category." Claim 1 also recites "a plurality of possible value lists for facilitating input and storage of product data into the database, each possible value list having a plurality of predetermined, user selectable values that are selectable during input and storage of product data as a value for an attribute of a product that is being classified and stored in the database so as to minimize potential error during inputting and storing of product data in accordance with the data model; wherein each attribute is associated with at least one of the plurality of possible value lists which has a plurality of predetermined, user selectable values that are selectable during input and storage of product data as a value for the associated attribute for the product being classified and stored in the database according to the data model."

Applicants respectfully submit that, in the rejection of Claim 1, the Examiner quoted claim language that is not recited in the pending claim. More specifically, the Examiner states in the rejection of Claim 1 that "Povilus teaches ... 'a plurality of attribute group definitions, each... **having an associated possible value list that identifies...**' (Povilus: see col. 14, lines 57-67, whereas Povilus' teachings of characteristics that differentiate each class... grouping...", clearly teaches group definitions **having a value list that identifies** values as indicated in applicant's claim language)". (Office Action page 2). (Emphasis added). Applicants respectfully submit that the "applicant's claim language" which the Examiner references does not correctly characterize the pending claim language in Claim 1. More specifically, Claim 1, as currently pending, does not recite "having an associated possible value list that identifies", as quoted by the Examiner. Further, the "a plurality of attribute group definitions" in Claim 1 does not recite having a value list that identifies values, as stated by the Examiner. Applicants respectfully submit that, instead of addressing the rejection to the pending Claim 1 (See Appendix VIII), the Examiner has addressed certain language including a phrase "having an associated possible value list that

identifies" that was recited in the **original** Claim 1 prior to later amendments, but is not recited in the pending Claim 1. Applicants respectfully submit that the Examiner's rejection does not take into account amendments to the "a plurality of attribute group definitions" element in Claim 1; therefore, the rejection does not fully address the elements recited in the pending Claim 1.

Further, Applicants respectfully submit that Povilus does not teach or suggest a plurality of attribute group definitions, each attribute group definition being arranged to identify one or more attributes that are associated with the attribute group of a product category, as claimed in Claim 1. The Examiner states that "Povilus teaches ...'a plurality of attribute group definitions, each having an associated possible value list that identifies...' (Povilus: see cot. 14, lines 57-67, whereas Povilus' teachings of characteristics that differentiate each class.. .grouping.. .", clearly teaches group definitions having a value list that identifies values as indicated in applicant's claim language). As stated in the present specification, "...the data model defines attributes for each of the classification categories. In effect, the attributes identify the type of data which is to be captured for each product within a particular category. One or more attributes (e. g., size, upgradability) may be specified for each category within the data model. By way of example, the attributes associated with each category may be arranged in one or more attribute groups". (Page 14, lines 1-6, Specification).

Applicants respectfully submit that attribute groups include groups of different types of data which can be captured for each product within a particular category; i.e. more than one different type of data may be capturable for a product within a category. Applicants respectfully submit that an attribute identifies the type of data to be captured for each product within a particular category. Applicants respectfully submit that Povilus teaches characteristics that "differentiate" each class (see Col. 14, lines 59-63) and that "divide" each class (see Col. 9, lines 29-32), not attribute groups, as claimed in Claim 1. For example, Povilus teaches dividing level sensors into those used to sense the level of a liquid and those only the level of a solid. It is respectfully submitted that, as seen in FIG. 3, Povilus shows the differentiating and dividing branching of characteristics; **not** grouping attributes into attribute groups. Applicants respectfully submit, therefore, that Povilus does not teach or suggest attribute groups as claimed in Claim 1.

Further, the Examiner acknowledges that Povilus does not teach "a plurality of possible value list each possible value list...so as to minimize potential error during inputting and storing of product data..." (Office Action, page 2). The Examiner states, however, that "Foster teaches 'a plurality of possible value list each possible value list... so as to minimize potential error during

inputting and storing product data...' (Foster: see paragraph [0024], [0033], and [0066])". (Office Action, page 2). The Examiner concludes that "[i]t would have been obvious at the time of the invention for one of ordinary skill in the art to have combined the teachings of Povilus and Foster, because using the steps of 'a plurality of possible value list each possible value list... so as to minimize potential error during inputting and storing of product data...' would have given those skilled in the art the ability to designate **classes** of product data by grouping them in regards to a data model. This gives users the advantage of processing product information according to groups more accurately". (Office Action, page 3). (Emphasis added).

Applicants respectfully submit that the supposed motivation the Examiner provides in the Office Action to combine the alleged teaching of Foster with the teachings of Povilus, is that "using the steps of '**a plurality of possible value list** each possible value list... so as to minimize potential error during inputting and storing product data...', would have given those skilled in the art the ability **to designate classes** of product data by grouping them in regards to a data model. This gives users the advantage of processing product information according to groups more accurately". (Office Action, page 3). (Emphasis added). Applicants respectfully submit that, even if Foster contained the teaching suggested by the Examiner, which Applicants do not agree that it does, classes appears in a class definition element in Claim 1, **not** in the "plurality of possible value lists" elements for which the Examiner cited Foster. Applicants respectfully submit that, therefore, the Examiner's expressed motivation to combine Foster and Povilus regarding "the ability to designate **classes** of product data by grouping them in regards to a data model" is **not a motivation regarding "the plurality of possibly value lists" element of the claimed invention for which Foster was cited**. Applicants respectfully submit, therefore, that the Examiner has not set forth a sufficient motivation and therefore, the Examiner's rationale cannot be used to support a conclusion that the claim would have been obvious to one of ordinary skill in the art.

Further regarding Foster, the Examiner states, however, that "Foster teaches 'a plurality of possible value list each possible value list... so as to minimize potential error during inputting and storing product data...' (Foster: see paragraph [0024], [0033], and [0066])". (Office Action, pages 2-3). Applicants respectfully submit that Foster in paragraph [0024] teaches a product editor that allows the input of product, but does not teach "possible value lists"; i.e., "[0024] The data engine 10 is a computer based relational software engine which includes at least one of the following: a product editor 20, a classification editor 30, a channel editor 40 and a horizon editor 50. The product editor 20, a classification editor 30, a channel editor 40 and a horizon editor 50 are all then

linked to a line editor 60. Basically, the product, classification, channel and horizon editors allow the inputting and manipulation of product, classification, channel, and horizon information which is then compiled and can then be manipulated by the line editor 60 to perform product line builds and consequently, output line lists. An exemplary line list for a sample men's product line is shown below: ..."

Applicants respectfully submit that in paragraph [0033] Foster teaches having standard pull down menus for the product editor and that "[i]nformation such as products, subproduct types, colors, palettes, palette colors, patterns, pattern colorways and colorway colors, sizes, size scales and size ranges, dimension, dimension scales and dimension ranges that any product [sic] can be established through the product editor 20". Applicants respectfully submit that Foster teaches that **"a product editor for providing product information for products."** (e.g., Paragraph [0009]). (Emphasis added). Applicants respectfully submit, however, that providing a product editor for providing product information for products which allows information such as colors, size ranges, and dimension ranges, etc. to be input to a product editor does **not** teach or suggest a possible value list or a possible value list which has values that are selectable during input and storage of product data, as claimed in Claim 1. That is, it is respectfully submitted that being allowed to input size ranges, or the other information specified in Foster, into a product editor that provides information for products, does not teach or suggest providing "possible value lists" having possible values that are selectable during input and storage. Applicants respectfully submit that inputting a size range into a product editor is **not** providing a possible value **list** of selectable possible values for an attribute of a product, as claimed in Claim 1. Applicants respectfully submit that, for example, a product editor that allows inputting information that a certain product can range from 10 to 60 feet in length does not teach a possible value list; i.e., a "range" does not teach or suggest a list of values or a list having selectable possible values. Further, Applicants respectfully submit that a range of values teaches away from having a selectable list of possible values - inputting a range of 10 to 60 feet for a size range, for example, does not teach or suggest a selectable possible values list. Applicants respectfully submit, therefore, that Foster does not teach or suggest, and in fact, teaches away, from a data structure having a plurality of possible values lists wherein possible value lists have a plurality of predetermined selectable values that are selectable during input and storage of product data, as claimed in Claim 1. Applicants respectfully submit, therefore, that Foster in the cited portions or elsewhere, does not teach or suggest "possible value lists" as claimed in Claim 1.

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Further, the Examiner states that "<u>Povilus</u> does not explicitly teach 'a plurality of predetermined, user selectable... predetermined, user selectable values.' Cassidy teaches 'a plurality of predetermined, user selectable... predetermined, user selectable values' (Cassidy: see col. 4, lines 36-57 and col. 5, lines 39-63). It would have been obvious at the time of the invention for one of ordinary skill in the art to have combined the teachings of <u>Povilus</u> and <u>Cassidy</u> above, because using the steps of 'a plurality of predetermined, user selectable... predetermined, user selectable values', would have given those skill in the art the ability to provide predetermined attributes and values regarding the inputting of data electronically. This gives users the advantage of receiving the most accurate data via an input mechanism more efficiently." (Office Action, page 3). (Underlining emphasis in original).

The Examiner cites a portion of Cassidy in Col. 4 which states: "[a]nother method aspect of the invention relates to a method of interactive purchase and sale of products, comprising the steps of providing an operational World Wide Web site having the description, content, look, feel, function, structure, architecture, operation, sensory features, aesthetic characteristics and substance of the World Wide Web site 'Dental-Purchasing.com,' selecting products by comparison shopping to determine the products meeting a predetermined selection criterion, and placing an order at said World Wide Web site for subsequent shipment. Yet another aspect of the invention relates to a computer network-based on-line comparison shopping system, comprising an operational World Wide Web site having the description, content, look, feel, function, structure, architecture, operation, sensory features, aesthetic characteristics and substance of the World Wide Web site 'Dental-Purchasing.com.' The invention in another aspect relates to a method of interactive purchase and sale of products, comprising the steps of providing an operational World Wide Web site." (Col. 4, lines 36-57).

Applicants respectfully submit that there is no teaching or suggestion in this portion of Cassidy of **"a plurality of predetermined, user selectable values"** and **"each possible values list having a plurality of predetermined, user selectable values that are selectable during input and storage"**, as claimed in Claim 1.

The Examiner also cites a portion of Cassidy in Col. 4 which states: "[t]he present invention provides a computer network-based on-line comparison shopping system and method of interactive purchase and sale of products, that in one embodiment features a dynamic database of goods and/or services by attributes that facilitate shopping for the purveyed products, and which generally enables the prospective purchaser to definitively (no empty search or dead-end results)

access comparative information about the goods and/or services of interest, and permits the decisional processes and implementation of an order for the desired products to be quickly, securely and effectively achieved. The present invention, in one aspect, utilizes a shopping cart that is selectively aggregatable and disaggregatable, in assembly of an order and subsequent order processing. By this feature, the system of the present invention achieves a capability not realized by online shopping systems of the prior art. The system of the applicants' invention for online shopping, embodies product information of multiple vendors, manufacturers and products, thereby enabling the user to selectively aggregate an order in the virtual shopping cart across the spectrum of such vendors, manufacturers and products. Once the order has been assembled, the order is electronically disaggregated by the software to produce vendor-specific orders which are transmitted to each individual vendor whose products have been selected."

Applicants respectfully submit that this cited portion also, has no teaching or suggestion of **"predetermined, user selectable values"**, as claimed in Claim 1. Further, there is no teaching in the cited portion of Cassidy or otherwise of "predetermined, user selectable values", as claimed in Claim 1, or "possible values lists having "a plurality of predetermined, user selectable values that are selectable during input and storage", as claimed in Claim 1.

Further, Cassidy is generally directed to a computer network-based on-line comparison shopping system and method of interactive purchase and sale of products. (See Summary of Invention, Col. 3, lines 19-21). Applicants respectfully submit that the Examiner has merely cited general descriptions of the invention in Cassidy and has not cited any teachings or suggestion of the specific limitation "predetermined, user selectable values", as claimed in Claim 1. Applicants respectfully submit, therefore, that the Examiner has failed to point out teachings in Cassidy of this limitation. Applicants respectfully submit that Cassidy, in the portions cited by the Examiner or otherwise, does not teach or suggest "predetermined, user selectable values", as claimed in Claim 1. Therefore, Applicants respectfully submit that, even if the teachings of Cassidy could be combined with the teachings of Povilus and Foster, which Applicants do not agree that it can be, such teachings or theoretical combination would not teach the data structure as claimed in Claim 1.

Claim 18 is system claim generally corresponding to Claim 1. The Examiner rejected Claim 18 for the same reasons set forth in the rejection of Claim 1.

For all of the above reasons, Applicants respectfully submit that Claims 1 and 18 are non-obvious based on Povilus, in view of Foster, and further in view of Cassidy.

Claims 2 and 19:

Claims 2 and 19 have been rejected under 35 U.S.C. § 103(a) as being obvious based on Povilus, in view of Foster, and further in view of Cassidy. The Examiner stated that: Claim 2 is rejected on grounds corresponding to arguments given above for rejected claim 1 and is similarly rejected including the following: --Povilus teaches 'a plurality of possible unit lists each possible...' (Povilus: see col. 13, lines, 34-67 and col. 14, lines 1-24, whereas Povilus' block ...', is equivalent to applicant use of the term 'unit')". (Office Action, Pages 3 and 4).

The data structure, as claimed in Claim 2, is "the data structure as recited in claim 1, further including a plurality of possible unit lists, each possible unit list being arranged to identify units that are selectable during input and storage of product data as a unit for an attribute of the product being classified and stored in the database according to the data model". As described by example in the specification, an exemplary unit list would include "Hz, KHz, MHz, GHz" for a "clock speed" attribute. (Page 17, lines 4-6).

Applicants respectfully submit that Col. 13, lines 34-67 in Povilus, cited by the Examiner, refers to "blocks" in the sense different shaped and looking graphical blocks representing different types of data structure elements in FIG. 10: "The drawing figures illustrating the data structure of the present invention include four different types of **blocks for representing different types of data structure elements. The block having rounded corners and a horizontal bar extended therethrough,** such as block 170 (FIG. 10), represents a Virtual Base Class, which is a base class (one which has no classes above it), as indicated by the **horizontal bar through the block**. The fact that this block has rounded corners is used to indicate that objects of this class are virtual, meaning they can only exist as embodiments of one of this class's descendant subclasses. The block having rounded corners and without a horizontal bar extended therethrough, such as block 172 (FIG. 10), represents a Virtual Class, which is a class that is a descendant of some other class, as indicated by the absence of a horizontal bar through the symbol... Again, the fact that this symbol has rounded corners is used to indicate ... The **block having square corners with a horizontal bar through the block**, such as block 174 (FIG. 10), represents a Base Class, which has no classes above it, as indicated by the horizontal bar through the block. Square corners indicate this class in not virtual; therefore, objects can be instantiated as members of this class or as members of any of this class's descendant classes. The **block having square corners with no horizontal line through the block, such as block 176** (FIG. 10), represents a Class, which is a

descendant of some other class, as indicated by the absence of a horizontal bar through the symbol. Again, the square corners indicate this class in not virtual; therefore, objects can be instantiated as members of this class or as members of any of this class's descendant classes." (Cited portion Col. 13, lines 34-67). (Emphasis added).

Applicants respectfully submit that the above portion of Povilus and Col. 14, lines 1-24 cited by the Examiner teaches blocks having attributes like square corners and horizontal lines, for example, tied to types of data structure elements. Applicants respectfully submit that that such "blocks" described in Povilus **do not teach or suggest a "unit" for an attribute of the product,** as claimed in Claim 2. Applicants respectfully submit that Povilus, including the teaching of the described "blocks", does not teach or suggest "a plurality of possible unit lists, as a unit for an attribute of the product being classified and stored in the database according to the data model." Applicants respectfully submit that there is no teaching or suggestion that the blocks in Povilus are units for an attribute of a product; and no teaching in Povilus of a unit list being arranged to identify units that are selectable during input and storage of product data, as claimed in Claim 2.

For all of the above reasons, Applicants respectfully submit, therefore, that Povilus does not teach the plurality of possible unit lists, as claimed in Claim 2. Applicants respectfully submit that Povilus, Foster, and Cassidy, either singly or in any theoretical combination, do not teach or suggest the plurality of possible unit lists, as claimed in Claim 2. For all of the above reasons, Applicants respectfully submit, therefore, that Claim 2 is non-obvious based on Povilus, in view of Foster, and further in view of Cassidy.

Claim 19 is system claim generally corresponding to Claim 2. The Examiner rejected Claim 19 for the same reasons set forth in the rejection of Claim 2. For all of the above reasons, Applicants respectfully submit that Claims 2 and 19 are non-obvious based on Povilus, in view of Foster, and further in view of Cassidy.

In addition, Claim 2 includes the data structure as recited in Claim 1 and Applicants respectfully submit that Povilus, Foster, and Cassidy, either singly or in any theoretical combination, do not teach or suggest the data structure as claimed in Claim 1 for the same reasons given above. Applicants respectfully submit that Povilus, Foster, and Cassidy, either singly or in any theoretical combination, do not teach or suggest the data structure as claimed in Claim 2, for this additional reason. Applicants respectfully submit, therefore, that Claims 2 and 19 are non-obvious based on Povilus, in view of Foster, and further in view of Cassidy, for this additional reason.

Claim 3:

Claim 3 has been rejected under 35 U.S.C. § 103(a) as being obvious based on Povilus, in view of Foster, and further in view of Cassidy. The Examiner stated that: Claim 3 is rejected on grounds "corresponding to the arguments given for rejected claims 1-2 and [is] similarly rejected including the following: --Povilus teaches 'possible value list is combined with each one... a normalized value' (Povilus: col. 19, lines 15-27)". (Office Action, page 4).

Claim 3 recites "The data structure as recited in claim 2, wherein each one of the values in the possible value list is combined with each one of the units in an associated possible unit list for one of the attributes to create a possible value-unit combination, and wherein each possible value-unit combination is normalized." Applicants respectfully submit that, as can be seen, **Claim 3 does not recite "a normalized value"** as quoted by the Examiner in his rejection. In contrast, it is respectfully submitted that Claim 3 includes creating a possible value-unit **combination** which is normalized. Applicants respectfully submit, therefore, that the Examiner has not set forth teachings of a **normalized possible value-unit combination**, as claimed in Claim 3.

Further, Applicants admit that Claim 3 contains the word "normalized" and that Povilus contains the word "normalized" in the portion cited by the Examiner. However, Applicants respectfully submit that Povilus merely refers in the portion to a "normalized base SKU table" 331 in FIG. 18. (See Col. 19, lines 16-28). Applicants respectfully submit that a "normalized base SKU table" in Povilus does not teach or suggest a normalized possible value-unit combination; where the possible value-unit combination is created by combining each one of the values in the possible value list with each one of the units in an associated possible unit list for one of the attributes, as claimed in Claim 3. Moreover, Applicants respectfully submit that Povilus, Foster, and Cassidy, either singly or in any theoretical combination, do not teach or suggest the normalized possible value-unit combination, as claimed in Claim 3.

For the above reasons, Applicants respectfully submit that Claim 3 is non-obvious based on Povilus, in view of Foster, and further in view of Cassidy.

In addition, Applicants respectfully submit that Povilus, Foster, and Cassidy, either singly or in any theoretical combination, do not teach or suggest the data structure as claimed in Claim 1 for the same reasons given above. Claim 3 depends indirectly from Claim 1, Applicants respectfully submit, therefore, that Povilus, Foster, and Cassidy, either singly or in any theoretical combination, do not teach or suggest the data structure as claimed in Claim 3, for this additional

reason. Applicants respectfully submit, therefore, that Claim 3 is non-obvious based on Povilus, in view of Foster, and further in view of Cassidy, for this additional reason.

Claims 4 and 20:

Claims 4 and 20 have been rejected under 35 U.S.C. § 103(a) as being obvious based on Povilus, in view of Foster, and further in view of Cassidy. The Examiner stated that: Claim 4 is rejected on grounds "corresponding to the arguments given for rejected claims 1-2 and [is] similarly rejected including the following: --Povilus teaches 'possible value list is combined with each one... a normalized value' (Povilus: col. 19, lines 15-27)." (Office Action, page 4).

Claim 4 recites: "The data structure as recited in claim 1, wherein each attribute is associated with a multi-value indicator that indicates that more than one of the values in the associated possible value list are selectable during input and storage of product data as values for the associated attribute for the product being classified and stored in the database according to the data model when the multi-value indicator is in a predefined state". Applicants respectfully submit that **Claim 4 does not recite "a normalized value" as quoted by the Examiner in his rejection;** therefore, the Examiner has not addressed the limitations in Claim 4 and has not set forth the requisite teaching to make a prima facie case of obviousness for Claim 4.

In addition, Applicants respectfully submit that Povilus refers in the portion cited by the Examiner to a "normalized base SKU table" 331 in FIG. 18. (See, e.g., Col. 19, lines 15-27). Applicants respectfully submit that a "normalized base SKU table" in Povilus, and other teachings in Povilus, do not teach or suggest "a multi-value indicator" as claimed in Claim 4 such that "each attribute is associated with a multi-value indicator that indicates that more than one of the values in the associated possible value list are selectable during input and storage of product data as values for the associated attribute for the product being classified and stored in the database according to the data model when the multi-value indicator is in a predefined state".

Moreover, Applicants respectfully submit that Povilus, Foster, and Cassidy, either singly or in any theoretical combination, do not teach or suggest **a multi-value indicator,** as claimed in Claim 4. For all of the above reasons, Applicants respectfully submit, therefore, that Claim 4 is non-obvious based on Povilus, in view of Foster, and further in view of Cassidy.

Claim 20 is system claim generally corresponding to Claim 4. The Examiner rejected Claim 20 for the same reasons set forth in the rejection of Claim 4.

For all of the above reasons, Applicants respectfully submit that Claims 4 and 20 are non-

obvious based on Povilus, in view of Foster, and further in view of Cassidy.

In addition, Applicants respectfully submit that Povilus, Foster, and Cassidy, either singly or in any theoretical combination, do not teach or suggest the data structure as claimed in Claim 1 for the same reasons given above. Claim 4 depends from Claim 1, Applicants respectfully submit, therefore, that Povilus, Foster, and Cassidy, either singly or in any theoretical combination, do not teach or suggest the data structure as claimed in Claim 4. Applicants respectfully submit, therefore, that Claim 4 is non-obvious based on Povilus, in view of Foster, and further in view of Cassidy, for this additional reason.

Claims 5 and 21:

Claims 5 and 21 have been rejected under 35 U.S.C. § 103(a) as being obvious based on Povilus, in view of Foster, and further in view of Cassidy. The Examiner states that: "Claim 5 is rejected on grounds corresponding to the arguments given above for rejected claim 1 and is similarly rejected including the following: Povilus teaches attributes associated with a data capture priority indicator that assigns priorities..." (Povilus: see col. 14, lines 64, whereas Povilus ' inheritance block with attributes incorporate an order or priority of attributes associated with the different blocks, therefore teach attributes with a priority that assigns priorities as taught by the applicant above.)". (Office Action, page 4).

Claim 5 recites: "The data structure as recited in claim 1, wherein each of the attributes is associated with a data capture priority indicator that assigns priorities to at least some of the one or more attributes for capture of product data for the attributes in accordance with the assigned priorities".

Firstly, the paragraph that includes Povilus col. 14, line 64 recites: "above-described example, the Functionality frame (node", and does recite inheritance blocks as stated by the Examiner. Applicants respectfully submit that neither Col. 14, line 64 or its corresponding paragraph contain any teaching or suggestion of **"a data capture priority indicator"** or "a data capture priority indicator that that assigns priorities to at least some of the one or more attributes for capture of product data for the attributes in accordance with the assigned priorities", as claimed in Claim 5.

Further, Applicants respectfully submit that Povilus does teach "a data structure of the present invention include four different types of blocks for representing different types of data structure elements" (Col. 13, lines 44-45) and "[w]hen two or more blocks are shown overlapping

one another, this represents an Inheritance in which the underlying blocks inherit all the attributes and behaviors of the overlying block in addition to having their own. For example, in FIG. 10, blocks 172 and 178 inherit all the attributes and behaviors of block 170, in addition to having their own". (Col. 14, lines 13-18). However, Applicants respectfully submit that blocks representing different types of data structure elements, even if they inherit attributes of other blocks, do not teach or suggest "a data capture priority indicator" or limitations regarding same, as claimed in Claim 5.

Moreover, Applicants respectfully submit that Povilus, Foster, and Cassidy, either singly or in any theoretical combination, do not teach or suggest "a data capture priority indicator" or limitations regarding same, as claimed in Claim 5. Applicants respectfully submit, therefore, that Claim 5 is non-obvious based on Povilus, in view of Foster, and further in view of Cassidy.

Claim 21 is system claim generally corresponding to Claim 5. The Examiner rejected Claim 21 for the same reasons set forth in the rejection of Claim 5.

For all of the above reasons, Applicants respectfully submit that Claims 5 and 21 are non-obvious based on Povilus, in view of Foster, and further in view of Cassidy.

In addition, Applicants respectfully submit that Povilus, Foster, and Cassidy, either singly or in any theoretical combination, do not teach or suggest the data structure as claimed in Claim 1 for the same reasons given above. Claim 5 depends from Claim 1, Applicants respectfully submit, therefore, that Povilus, Foster, and Cassidy, either singly or in any theoretical combination, do not teach or suggest the data structure as claimed in Claim 5. Applicants respectfully submit, therefore, that Claim 5 is non-obvious based on Povilus, in view of Foster, and further in view of Cassidy, for this additional reason.

Claims 6 and 22:

Claims 6 and 22 have been rejected under 35 U.S.C. § 103(a) as being obvious based on Povilus, in view of Foster, and further in view of Cassidy. The Examiner stated that: "Claim 6 is rejected on the grounds corresponding to the arguments given above for rejected claim 1 and is similarity rejected including the following: Povilus teaches 'a possible coutries (sic) table specifying one or more countries that are selectable as countries for which a product is adapted for sale' (Povilus: see figure 19 -sheet 14 of 38 and col. 19-20, lines 57-67, and 1-30 respectively; whereas Povilus' table clearly has placeholders for variable information (i.e., countries) that are selectable with a sale element attached, as indicated by the applicant's claim." (Office Action,

page 4).

Claim 6 recites: "The data structure as recited in claim 1, further including: a possible countries table specifying one or more countries that are selectable during input and storage of product data as countries for which a product being classified and stored in the database according to the data model is adapted for sale".

Povilus describes a "SKU table template (313) is generated by a computer program operating upon information already existing in the KnowledgeBase portion (FIG. 10) of the data foundation (248)". (Col. 19, lines 64-67). Applicants respectfully submit that a SKU table is not "a possible countries table" as claimed in Claim 6. Secondly, Povilus describes the SKU table template as having "[a] third category of columns ("custom columns ") is made up of columns that can be different for each different manufacturer's table within the same realm. Whereas the first two categories are automatically added to a SKU table at its creation, columns are added for the custom columns category manually, as needed to capture entries for additional manufacturer characteristics not included in the realm's concept frame(s)." (Col. 20, lines 19-26). Applicants respectfully submit that **"the custom columns" and SKU table template** taught in Povilus do not teach or suggest a **possible countries table**, as claimed in Claim 6, i.e., does not teach or suggest a possible countries table specifying one or more countries that are selectable during input and storage of product data as countries for which a product being classified and stored in the database according to the data model is adapted for sale", as claimed in Claim 6.

Moreover, Applicants respectfully submit that Povilus, Foster, and Cassidy, either singly or in any theoretical combination, do not teach or suggest a possible countries table as claimed in Claim 6. Applicants respectfully submit, therefore, that, for the above reasons, Claim 6 is non-obvious based on Povilus, in view of Foster, and further in view of Cassidy.

Claim 22 is system claim generally corresponding to Claim 6. The Examiner rejected Claim 22 for the same reasons set forth in the rejection of Claim 6.

For all of the above reasons, Applicants respectfully submit that Claims 6 and 22 are non-obvious based on Povilus, in view of Foster, and further in view of Cassidy.

In addition, Applicants respectfully submit that Povilus, Foster, and Cassidy, either singly or in any theoretical combination, do not teach or suggest the data structure as claimed in Claim 1 for the same reasons given above. Claim 6 depends from Claim 1, Applicants respectfully submit, therefore, that Povilus, Foster, and Cassidy, either singly or in any theoretical combination, do not teach or suggest the data structure as claimed in Claim 6. Applicants respectfully submit,

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therefore, that Claim 6 is non-obvious based on Povilus, in view of Foster, and further in view of Cassidy, for this additional reason.

Claims 7 and 23:

Claims 7 and 23 have been rejected under 35 U.S.C. § 103(a) as being obvious based on Povilus, in view of Foster, and further in view of Cassidy. The Examiner stated that: "Claim 7 is rejected on grounds corresponding to the arguments given above for rejected claims 1 and 6 and is similarly rejected including the following: Povilus teaches 'platforms that are compatible with a specific product' (Povilus: see col. 19, lines 24-67)". (Office Action, page 5).

Claim 7 recites: "The data structure as recited in claim 1, further including: a possible compatibility table including one or more platforms that are selectable during input and storage of product data as platforms which are compatible with a specific product being classified and stored in the database according to the data model".

Applicants respectfully submit that the portion in Povilus cited by the Examiner refers to steps for generating a normalized base SKU table, makes no mention of **platforms**, and does not teach or suggest a **possible compatibility table including one or more platforms** that are selectable during input and storage of product data as platforms which are compatible with a specific product, as claimed in Claim 7.

Moreover, Applicants respectfully submit that Povilus, Foster, and Cassidy, either singly or in any theoretical combination, do not teach or suggest possible compatibility table including one or more selectable platforms, as claimed in Claim 7. For the above reasons, Applicants respectfully submit that Claim 7 is non-obvious based on Povilus, in view of Foster, and further in view of Cassidy.

Claim 23 is system claim generally corresponding to Claim 7. The Examiner rejected Claim 23 for the same reasons set forth in the rejection of Claim 7.

For all of the above reasons, Applicants respectfully submit that Claims 7 and 23 are non-obvious based on Povilus, in view of Foster, and further in view of Cassidy.

In addition, Applicants respectfully submit that Povilus, Foster, and Cassidy, either singly or in any theoretical combination, do not teach or suggest the data structure as claimed in Claim 1 for the same reasons given above. Claim 7 depends from Claim 1, Applicants respectfully submit, therefore, that Povilus, Foster, and Cassidy, either singly or in any theoretical combination, do not teach or suggest the data structure as claimed in Claim 7. Applicants respectfully submit,

therefore, that Claim 7 is non-obvious based on Povilus, in view of Foster, and further in view of Cassidy, for this additional reason.

Claims 8 and 24:

Claims 8 and 24 have been rejected under 35 U.S.C. § 103(a) as being obvious based on Povilus, in view of Foster, and further in view of Cassidy. The Examiner stated that: "Claim 8 is rejected on grounds corresponding to the arguments given above for rejected claim 1 and is similarly rejected including the following: Povilus teaches **'a plurality of manufacturer SKUs...SKU system...'** (Povilus: see col. 6, lines 47-67) **'a customer mapping table that maps each system SKU to a customer...** ' (Povilus: col. 22, lines 20-67)". (Office Action, page 5). (Bolding emphasis added).

Claim 8 includes, among other elements not specifically recited in Claim 1,: **a plurality of system SKUs, a plurality of manufacturer SKUs, an attribute table, and a customer mapping table.** Applicants respectfully submit that the Examiner mentioned **only two** of the four limitations; i.e., "a plurality of manufacturing SKUs" and the "customer mapping table" elements, in his rejection. It is respectfully submitted, therefore, that the Examiner has failed to identify or set forth any teachings in Povilus or any other reference regarding the following elements in Claim 8: **a plurality of system SKUs, and an attribute table.** Therefore, Applicants respectfully submit that, for at least this reason, Claim 8 is non-obvious based on Povilus, in view of Foster, and further in view of Cassidy.

Further, Povilus teaches: "In general, the product database includes listings of products that are available from one or more manufacturer. Preferably, such listings allow the identification of these products by their stock keeping unit (SKU) number, which is a number uniquely identifying products that the manufacturer or distributer keeps in stock". (Col. 6, lines 48-53). Applicants respectfully submit that Povilus does not teach separate system SKUs and a separate manufacturer SKUs, as claimed in Claim 8. Applicants respectfully submit that Povilus describes a process shown in FIG. 18 including creating a normalized SKU table 331, and that the process in FIG. 18 is "undertaken independently for each manufacturer who makes products within the realm of interest." (Col. 19, lines 15-19). Thus, Applicants respectfully submit that Povilus teaches creating a SKU table for each manufacturer. Applicants respectfully submit that Povilus does not teach or suggest creating separate system SKUs and separate manufacturer SKUs, as claimed in Claim 8.

Further, Applicants respectfully submit that Povilus does not teach or suggest an attribute table, as claimed in Claim 8. Further, Applicants respectfully submit that Povilus does not teach each manufacturer SKU being associated with one of the plurality of system SKUs, as claimed in Claim 8.

Further, the Examiner states that 'a customer mapping table that maps each system SKU to a customer...' is taught in Povilus: col. 22, lines 20-67. (See Office Action, page 5). Applicants respectfully submit that the **customer mapping table** as claimed in Claim 8, "maps each system SKU **to a customer SKU assigned to the corresponding product by a particular customer** to which product data associated with the product is to be provided, the customer being a retailer, reseller, manufacturer, or distributor that has requested the product data." It is respectfully submitted that Povilus does not teach in the portion cited by the Examiner, or otherwise, **"a customer SKU"** where "the customer being a retailer, reseller, manufacturer, or distributor that has requested the product data", as claimed in Claim 8. As stated above, Applicants respectfully submit that Povilus teaches creating a normalized SKU table 331 in a process undertaken independently **for each manufacturer** who makes products within the realm of interest (see Col. 19, lines 15-19), there is no teaching of SKUs **for customers** where the customer is a retailer, reseller, manufacturer, or distributor **that has requested the product data**, as claimed in Claim 8. It is respectfully submitted, therefore, that Povilus does not teach or suggest a customer mapping table that maps each system SKU to a customer SKU assigned to the corresponding product by a particular customer to which product data associated with the product is to be provided, as claimed in Claim 8. Applicants respectfully submit that no such mapping of customer SKUs, where the customer is a retailer, reseller, manufacturer, or distributor that has requested the product data, and system SKUs, is taught or suggested in Povilus.

For all of the above reasons, Applicants respectfully submit that Povilus does not teach or suggest the data structure as claimed in Claim 8. Applicants respectfully submit that that none of the cited references, either singly or in any theoretical combination, do not teach the data structure including the plurality of system SKUs, a plurality of manufacturer SKUs, an attribute table, and a customer mapping table, as claimed in Claim 8

Claim 24 is system claim generally corresponding to Claim 8. The Examiner rejected Claim 24 for the same reasons set forth in the rejection of Claims 1 and 8.

For all of the above reasons, Applicants respectfully submit that Claims 8 and 24 are non-obvious based on Povilus, in view of Foster, and further in view of Cassidy.

In addition, Applicants respectfully submit that possible value list, each value list having a plurality of predetermined selectable values, as claimed in Claim 8, is not taught or suggest by Povilus, Foster, or Cassidy, either singly or in any theoretical combination, for the same reasons given above for Claim 1 with regard to this limitation. Applicants respectfully submit, therefore, that Povilus, Foster, and Cassidy, either singly or in any theoretical combination, do not teach or suggest the data structure as claimed in Claim 8. Applicants respectfully submit, therefore, that Claim 8 is non-obvious based on Povilus, in view of Foster, and further in view of Cassidy, for this additional reason.

Claim 9:

Claim 9 has been rejected under 35 U.S.C. § 103(a) as being obvious based on Povilus, in view of Foster, and further in view of Cassidy. The Examiner stated that: "Claim 9 is rejected on grounds corresponding to the **arguments given above for rejected claims 2-3** and is similarly rejected including **the following:** Claim 11 is rejected on grounds corresponding to the arguments given above for rejected claim 1 and is similarly rejected including the following: Povilus teaches 'a category identifier associated with each one of the plurality of products ...corresponding product' (Povilus: see col. 3, lines 8-54)". (Office Action, page 5). (Bolding emphasis added).

Applicants respectfully submit that Claim 9 does not recite "a category identifier", therefore, the Examiner's statement that "Povilus teaches 'a category identifier ...'" clearly does not apply to Claim 9. It is respectfully submitted, therefore, that the Examiner failed to provide any teachings after "the following" regarding Claim 9.

Further, Applicants respectfully submit that **Claims 2-3** cited by the Examiner, and his rejection of those claims, **do not include** a plurality of system SKUs, a plurality of manufacturer SKUs, an attribute table, or a customer mapping table, as claimed in Claim 9. For at least this reason, therefore, **the Examiner has failed to set forth teaching regarding certain elements in Claim 9, so a prima facie case of obviousness for Claim 9 has not been made.** For at least this reason, Applicants respectfully submit that Claim 9 is non-obvious based on the cited references.

Further, Claim 9 includes wherein each attribute has an associate possible unit list that identifies units that are selectable during input and storage of product data as a units for an attribute of a product being classified and stored in the database according to the data model. Applicants respectfully submit that Povilus, Foster, and Cassidy, either singly or in any theoretical combination, do not teach or suggest the associate possible unit list, as claimed in Claim 9.

Regarding the Examiner's referenced argument regarding Claim 2, Applicants respectfully submit that the cited portion, in the argument, of Povilus and Col. 14, lines 1-24, teaches blocks having attributes like square corners and horizontal lines, for example tied to types of data structure elements. Applicants respectfully submit that that such "blocks" described in Povilus do not teach or suggest a "unit" for an attribute of the product, as claimed in Claim 9. Applicants respectfully submit that there is no teaching or suggestion that the blocks in Povilus are units for an attribute of a product, and no teaching in Povilus of a unit list being arranged to identify units that are selectable during input and storage of product data, as claimed in Claim 9.

Further, Claim 9 includes "wherein at least some of the selected attributes in the attribute table have units in the associated possible unit list, wherein each attribute value and associated unit is normalized". Applicants respectfully submit that it follows from the above argument that Povilus does not teach or suggest an associated possible unit list and, therefore, also does not teach or suggest normalizing attribute value and associated units, as claimed in Claim 9. Moreover, Applicants respectfully submit that Povilus, Foster, and Cassidy, either singly or in any theoretical combination, do not teach or suggest an associated possible unit list; and, therefore, also does not teach or suggest normalizing attribute value and associated units, as claimed in Claim 9.

For these additional reasons, Applicants respectfully submit that Claim 9 is non-obvious based on Povilus, in view of Foster, and further in view of Cassidy.

In addition, Claim 9 includes the data structure from Claim 8, and Applicants respectfully submit that Povilus, Foster, and Cassidy, either singly or in any theoretical combination, do not teach or suggest the data structure as claimed in Claim 8 for the same reasons given above. Applicants respectfully submit, therefore, that Povilus, Foster, and Cassidy, either singly or in any theoretical combination, do not teach or suggest the data structure as claimed in Claim 9. Applicants respectfully submit, therefore, that Claim 9 is non-obvious based on Povilus, in view of Foster, and further in view of Cassidy, for this additional reason.

Claim 11:

Claim 11 has been rejected under 35 U.S.C. § 103(a) as being obvious based on Povilus, in view of Foster, and further in view of Cassidy. The Examiner stated that: "Claim 11 is rejected on grounds corresponding to the arguments given above for **rejected claim 1** and is similarly rejected including the following: Povilus teaches 'a category identifier associated with each one of the

plurality of products ...corresponding product' (Povilus: see col. 3, lines 8-54)". (Office Action, page 5). (Bolding emphasis added).

The Examiner rejected Claim 11 on grounds corresponding to the arguments given above **for rejected Claim 1** and alleged Povilus teaching regarding a catalog identifier. Applicants respectfully submit that Claim 11 includes the data structure as recited in Claim 8, and respectfully submits that **Claim 1 cited by the Examiner in the rejection**, and his rejection of Claim 1, **do not include** a plurality of system SKUs, a plurality of manufacturer SKUs, an attribute table, or a customer mapping table, as claimed in Claim 11, therefore, **the Examiner has failed to set forth teaching regarding certain elements in Claim 11; so a prima facie case of obviousness for Claim 11 has not been made.** For at least this reason, Applicants respectfully submit that Claim 11 is non-obvious based on the cited references.

Further, Claim 11 recites: "The data structure as recited in claim 8, further including: a category identifier associated with each one of the plurality of products classified and stored in the database according to the data model, the category identifier being arranged to identify the category associated with the corresponding product". It is respectfully submitted that, in his rejection, the Examiner cites nearly the entire body of the Summary of the Invention of Povilus, but no teaching or suggestion appears anywhere in the entire Summary, or elsewhere in Povilus, of "a category identifier" as claimed in Claim 11. For at least this additional reason, Applicants respectfully submit that Claim 11 is non-obvious based on Povilus, in view of Foster, and further in view of Cassidy.

In addition, Claim 11 depends from Claim 8, and Applicants respectfully submit that Povilus, Foster, and Cassidy, either singly or in any theoretical combination, do not teach or suggest the data structure as claimed in Claim 8 for the same reasons given above. Applicants respectfully submit, therefore, that Povilus, Foster, and Cassidy, either singly or in any theoretical combination, do not teach or suggest the data structure as claimed in Claim 11. For at least these reasons, Applicants respectfully submit that Claim 11 is non-obvious based on Povilus, in view of Foster, and further in view of Cassidy on this basis also.

<u>Claim 12</u>:

Claim 12 has been rejected under 35 U.S.C. § 103(a) as being obvious based on Povilus, in view of Foster, and further in view of Cassidy. The Examiner stated that: "Claim 12 is rejected on grounds corresponding to the arguments given above for **rejected claim 1** and is similarly rejected including the following: Povilus teaches 'a manufacturer product description associated with each one of the... describing standard features of the associated product' (Povilus: see col. 51, lines 34-67)".

The Examiner rejected Claim 12 on grounds corresponding to the arguments given above **for rejected Claim 1** and alleged Povilus teaching(s) regarding a manufacturer product description. Applicants respectfully submit that Claim 12 includes the data structure as recited in Claim 8, and respectfully submits that **Claim 1 cited by the Examiner in the rejection**, and his rejection of Claim 1, **do not include** a plurality of system SKUs, a plurality of manufacturer SKUs, an attribute table, or a customer mapping table, as claimed in Claim 12, therefore, **the Examiner has failed to set forth teaching regarding certain elements in Claim 12; so a prima facie case of obviousness for Claim 12 has not been made.** For at least this reason, Applicants respectfully submit that Claim 12 is non-obvious based on the cited references.

Further, Claim 12 recites "[t]he data structure as recited in claim 8, further including: a manufacturer product description associated with each one of the plurality of products classified and stored in the database according to the data model, the manufacturer product description describing standard features of the associated product". It is respectfully submitted that the portion in Povilus, col. 51, lines 34-67, cited by the Examiner is part of Povilus' Claim 12, 13-19, and part of Claim 20. However, Applicants respectfully submit that the cited portion in Povilus does not teach or suggest **a manufacturer product description describing standard features of the associated product,** as claimed in Claim 12. Further, it is respectfully submitted that Povilus does not teach or suggest the manufacturer product description associated with each one of the plurality of products classified and stored in the database according to the data model, as claimed in Claim 12. Applicants respectfully submit that Povilus, Foster, and Cassidy, either singly or in any theoretical combination, do not teach or suggest a manufacturer product description associated with each one of the plurality of products classified and stored in the database according to the data model, the manufacturer product description describing standard features of the associated product, as claimed in Claim 12. Applicants respectfully submit, therefore, Claim 12 is non-obvious based on Povilus, in view of Foster, and further in view of Cassidy for this reason also.

In addition, Claim 12 includes the data structure from Claim 8, and Applicants respectfully submit that Povilus, Foster, and Cassidy, either singly or in any theoretical combination, do not teach or suggest the data structure as claimed in Claim 8 for the same reasons given above. Applicants respectfully submit, therefore, that Povilus, Foster, and Cassidy, either singly or in any theoretical combination, do not teach or suggest the data structure as claimed in Claim 12. Applicants respectfully submit, therefore, that Claim 12 is non-obvious based on Povilus, in view of Foster, and further in view of Cassidy, for this additional reason.

Claim 13:

Claim 13 has been rejected under 35 U.S.C. § 103(a) as being obvious based on Povilus, in view of Foster, and further in view of Cassidy. The Examiner stated that: "Claim 13 is rejected on grounds corresponding to the arguments given above for **rejected claim 1** and is similarly rejected including the following: Povilus teaches 'an image table including link to one or more images illustrating the plurality of products...' (Povilus: see col. 25, lines 16-50)". (Office Action, page 6). (Bolding emphasis added).

The Examiner rejected Claim 13 on grounds corresponding to the arguments given above **for rejected claim 1** and alleged Povilus teaching(s) regarding an image table. Applicants respectfully submit that Claim 13 includes the data structure as recited in **Claim 8**, and respectfully submits that **Claim 1 cited by the Examiner** in the rejection, and his rejection of Claim 1, **do not include** a plurality of system SKUs, a plurality of manufacturer SKUs, an attribute table, or a customer mapping table, as claimed in Claim 13, therefore, **the Examiner has failed to set forth teaching regarding certain elements in Claim 13; so a prima facie case of obviousness for Claim 13 has not been made.** For at least this reason, Applicants respectfully submit that Claim 13 is non-obvious based on the cited references.

Further, Claim 13 recites "[t]he data structure as recited in claim 8, further including: an image table including a link to one or more images illustrating the plurality of products classified and stored in the database according to the data model". The Examiner states that Povilus teaches 'an image table including link to one or more images illustrating the plurality of products...' (Povilus: see col. 25, lines 16-50)". It is respectfully submitted that the cited portion merely describes FIGs. 22-24 in Povilus; but does not describe or suggest any image tables, as claimed in Claim 13. Applicants respectfully submit also that Povilus, in the cited portion and otherwise, does not teach or suggest a link to one or more images illustrating the plurality of products

classified and stored in the database according to the data model, or an image table including the link, as claimed in Claim 13. Applicants respectfully submit that Povilus, Foster, and Cassidy, either singly or in any theoretical combination, do not teach or suggest an image table, as claimed in Claim 13. Applicants respectfully submit, therefore, Claim 13 is non-obvious based on Povilus, in view of Foster, and further in view of Cassidy for this reason also.

In addition, Claim 13 includes the data structure recited in Claim 8, and Applicants respectfully submit that Povilus, Foster, and Cassidy, either singly or in any theoretical combination, do not teach or suggest the data structure as claimed in Claim 8 for the same reasons given above. Applicants respectfully submit, therefore, that Povilus, Foster, and Cassidy, either singly or in any theoretical combination, do not teach or suggest the data structure as claimed in Claim 13. Applicants respectfully submit that Claim 13 is non-obvious based on Povilus, in view of Foster, and further in view of Cassidy for this additional reason.

Claim 14:

Claim 14 has been rejected under 35 U.S.C. § 103(a) as being obvious based on Povilus, in view of Foster, and further in view of Cassidy. The Examiner stated that: "Claim 14 is rejected on grounds corresponding to the arguments given above for **rejected claim 1** and is similarly rejected including the following: Povilus teaches 'a marketing description for selected... products' (Povilus: see col. 33, lines 55-67 and col. 34, lines 5-25)". (Office Action, page 6). (Bolding emphasis added).

The Examiner rejected Claim 14 on grounds corresponding to the arguments given above **for rejected Claim 1** and alleged Povilus teaching(s) regarding a marketing description. Applicants respectfully submit that Claim 14 includes the data structure as recited in **Claim 8**, and that **Claim 1 cited by the Examiner in the rejection**, and his rejection of Claim 1, **do not include** a plurality of system SKUs, a plurality of manufacturer SKUs, an attribute table, or a customer mapping table, as claimed in Claim 14, therefore, **the Examiner has failed to set forth teaching regarding certain elements in Claim 14; so a prima facie case of obviousness for Claim 14 has not been made.** For at least this reason, Applicants respectfully submit that Claim 14 is non-obvious based on the cited references.

In addition, Claim 14 includes the data structure recited in Claim 8, and Applicants respectfully submit that Povilus, Foster, and Cassidy, either singly or in any theoretical combination, do not teach or suggest the data structure as claimed in Claim 8 for the same reasons

given above. Applicants respectfully submit, therefore, that Povilus, Foster, and Cassidy, either singly or in any theoretical combination, do not teach or suggest the data structure as claimed in Claim 14. Applicants respectfully submit that Claim 14 is non-obvious based on Povilus, in view of Foster, and further in view of Cassidy for this additional reason.

Claim 15:

Claim 15 has been rejected under 35 U.S.C. § 103(a) as being obvious based on Povilus, in view of Foster, and further in view of Cassidy. The Examiner stated that: Claim 15 is rejected "on grounds corresponding to the arguments given above for rejected claims 1, and 6-7 and are similarly rejected". (Office Action, page 6).

The Examiner rejected Claim 15 on grounds corresponding to the arguments given above **for rejected Claims 1, 6, and 7.** Applicants respectfully submit that Claim 15 includes the data structure as recited **in Claim 8**, and that **Claims 1, 6, and 7 cited by the Examiner in the rejection**, and his rejection of Claims 1, 6 and 7, **do not include** a plurality of system SKUs, a plurality of manufacturer SKUs, an attribute table, or a customer mapping table, as claimed in Claim 15, therefore, **the Examiner has failed to set forth teaching regarding certain elements in Claim 15; so a prima facie case of obviousness for Claim 15 has not been made.** For at least this reason, Applicants respectfully submit that Claim 15 is non-obvious based on the cited references.

Further, Claim 15 recites: "[t]he data structure as recited in claim 8, further including: a country table specifying one or more countries for which each product classified and stored in the database according to the data model is adapted for sale". Povilus describes a "SKU table template (313) is generated by a computer program operating upon information already existing in the KnowledgeBase portion (FIG. 10) of the data foundation (248)". (Col. 19, lines 64-67). Applicants respectfully submit that a SKU table is not "a country table" as claimed in Claim 15. Secondly, Povilus describes the SKU table template as having "[a] third category of columns ("custom columns ") is made up of columns that can be different for each different manufacturer's table within the same realm. Whereas the first two categories are automatically added to a SKU table at its creation, columns are added for the custom columns category manually, as needed to capture entries for additional manufacturer characteristics not included in the realm's concept frame(s)." (Col. 20, lines 19-26). Applicants respectfully submit that "the custom columns" and SKU table template taught in Povilus do not teach or suggest **a country table**, as claimed in Claim

15, i.e., does not teach or suggest a country table specifying one or more countries for which each product classified and stored in the database according to the data model is adapted for sale", as claimed in Claim 15. Moreover, Applicants respectfully submit that Povilus, Foster, and Cassidy, either singly or in any theoretical combination, do not teach or suggest a country table as claimed in Claim 15. Applicants respectfully submit, therefore, that Claim 15 is non-obvious based on Povilus, in view of Foster, and further in view of Cassidy for this reason also.

In addition, Claim 15 includes the data structure recited in Claim 8, and Applicants respectfully submit that Povilus, Foster, and Cassidy, either singly or in any theoretical combination, do not teach or suggest the data structure as claimed in Claim 8 for the same reasons given above. Applicants respectfully submit, therefore, that Povilus, Foster, and Cassidy, either singly or in any theoretical combination, do not teach or suggest the data structure as claimed in Claim 15. Applicants respectfully submit that Claim 15 is non-obvious based on Povilus, in view of Foster, and further in view of Cassidy, for this additional reason.

Claim 16:

Claim 16 has been rejected under 35 U.S.C. § 103(a) as being obvious based on Povilus, in view of Foster, and further in view of Cassidy. The Examiner stated that: Claim 16 is rejected "on grounds corresponding to the arguments given above for rejected claims 1, and 6-7 and are similarly rejected". (Office Action, page 6).

The Examiner rejected Claim 16 on grounds corresponding to the arguments given above **for rejected Claims 1, 6, and 7.** Applicants respectfully submit that Claim 16 includes the data structure as recited **in Claim 8**, and that **Claims 1, 6, and 7 cited by the Examiner** in the rejection, and his rejection of Claims 1, 6 and 7, **do not include** a plurality of system SKUs, a plurality of manufacturer SKUs, an attribute table, or a customer mapping table, as claimed in Claim 16, therefore, **the Examiner has failed to set forth teaching regarding certain elements in Claim 16; so a prima facie case of obviousness for Claim 16 has not been made.** For at least this reason, Applicants respectfully submit that Claim 16 is non-obvious based on the cited references.

Further, Claim 16 recites: "[t]he data structure as recited in claim 8, further including: a related products table that indicates one or more related products associated with each of the plurality of products classified and stored in the database according to the data model". (Emphasis added). Applicants respectfully submit that Claims 1, 6, and 7, cited by the Examiner in the

rejection, and his rejection of Claims 1, 6 and 7, do not recite **"a related products table"**, therefore, **the Examiner has failed to set forth teaching regarding certain elements in Claim 16; so a prima facie case of obviousness for Claim 16 has not been made**, for this additional reason. Applicants respectfully submit that Claim 16 is non-obvious based on the cited references, for at least this additional reason.

Moreover, Applicants respectfully submit that Povilus, Foster, and Cassidy, either singly or in any theoretical combination, do not teach or suggest a related products table as claimed in Claim 16. Applicants respectfully submit, therefore, that Claim 16 is non-obvious based on Povilus, in view of Foster, and further in view of Cassidy on this basis also.

In addition, Claim 16 includes the data structure recited in Claim 8, and Applicants respectfully submit that Povilus, Foster, and Cassidy, either singly or in any theoretical combination, do not teach or suggest the data structure as claimed in Claim 8 for the same reasons given above. Applicants respectfully submit, therefore, that Povilus, Foster, and Cassidy, either singly or in any theoretical combination, do not teach or suggest the data structure as claimed in Claim 16. Applicants respectfully submit that Claim 16 is non-obvious based on Povilus, in view of Foster, and further in view of Cassidy, for this additional reason.

Claim 17:

Claim 17 has been rejected under 35 U.S.C. § 103(a) as being obvious based on Povilus, in view of Foster, and further in view of Cassidy. The Examiner stated that: "Claim 17 is rejected on grounds corresponding to the arguments given above for **rejected claim 1** and is similarly rejected including the following: <u>Povilus</u> teaches 'a product compatibility table including platform compatibility..." (Povilus: see col. 29, lines 45-67 and col. 30, lines 30-56)". (Office Action, page 6). (Bolding emphasis added).

The Examiner rejected Claim 17 on grounds corresponding to the arguments given above for rejected Claim 1 and alleged Povilus teaching(s) regarding a product compatibility table. Applicants respectfully submit that Claim 17 includes the data structure as recited in **Claim 8**, and that **Claim 1 cited by the Examiner in the rejection**, and his rejection of Claim 1, **do not include** a plurality of system SKUs, a plurality of manufacturer SKUs, an attribute table, or a customer mapping table, as claimed in Claim 17, therefore, **the Examiner has failed to set forth teaching regarding certain elements in Claim 17; so a prima facie case of obviousness for**

Claim 17 has not been made. For at least this reason, Applicants respectfully submit that Claim 17 is non-obvious based on the cited references.

Further, Claim 17 recites "[t]he data structure as recited in claim 8, further including: a product compatibility table including platform compatibility information associated with each product classified and stored in the database according to the data model". The Examiner states that Povilus teaches 'a product compatibility table including platform compatibility..." (Povilus: see col. 29, lines 45-67 and col. 30, lines 30-56)". (Office Action, page 6). Applicants respectfully submit that the portions in Povilus cited by the Examiner do not teach or suggest platforms associated with each product. As stated "by way of example" in the present specification, "a computer product may be compatible with at least one of a Macintosh and a PC ... each platform ", referring in the example to the Macintosh and PC platforms for a software product. (See Specification, page 23, lines 14-16). Applicants respectfully submit that Povilus does not teach or suggest a **product compatibility table** including **platform compatibility information associated with each product** classified and stored in the database according to the data model, as claimed in Claim 17. Moreover, Applicants respectfully submit that Povilus, Foster, and Cassidy, either singly or in any theoretical combination, do not teach or suggest a product compatibility table, as claimed in Claim 17. For the above additional reasons, Applicants respectfully submit that Claim 17 is non-obvious based on Povilus , in view of Foster, and further in view of Cassidy.

Further, Applicants respectfully submit that Povilus, Foster, and Cassidy, either singly or in any theoretical combination, do not teach or suggest a product compatibility table, as claimed in Claim 17. Applicants respectfully submit, therefore, Claim 17 is non-obvious based on Povilus, in view of Foster, and further in view of Cassidy on this basis also.

In addition, Claim 17 includes the data structure recited in Claim 8, and Applicants respectfully submit that Povilus, Foster, and Cassidy, either singly or in any theoretical combination, do not teach or suggest the data structure as claimed in Claim 8 for the same reasons given above. Applicants respectfully submit, therefore, that Povilus, Foster, and Cassidy, either singly or in any theoretical combination, do not teach or suggest the data structure as claimed in Claim 17. Applicants respectfully submit that Claim 17 is non-obvious based on Povilus, in view of Foster, and further in view of Cassidy for this additional reason.

Conclusion

For the above reasons, Applicants respectfully submit that all pending claims, Claims 1-9 and 11-24, in the present application are allowable. Such allowance is respectfully solicited.

If a telephone conference would expedite prosecution of this application, the Examiner is invited to telephone the undersigned at (415) 984-8200.

Respectfully submitted,

/James W. Drapinski/
James W. Drapinski
Registration No. 46,242

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Date
NIXON PEABODY LLP
Suite 900, 401 9th Street, N.W
Washington, D.C. 20004-2128
(415) 984-8200